

APPENDIX RECORD

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U.S. DISTRICT COURT  
DISTRICT OF MASS.

## Exhibits 1-15

The entire lower court and Single Justice  
Appendix record.

SUPREME JUDICIAL COURT

1.42 SJC

Suffolk, ss

Single Justice

SJ - 2020-576

In Re Carla Marie Confarto

PETITION FOR EXTRAORDINARY RELIEF c21183

Introduction

Trial Judge will not appoint counsel. This decision does not satisfy due process clause - Insofar as Holloway v. Michigan held that once counsel appointed its the duty of the state to provide effective counsel.

Jurisdiction

Jurisdiction is conferred upon this court under the courts common law and Constitutional powers. Secondary jurisdiction is MGLC 21183

Parties

Carla Marie Confarto Mother

Leslie Martin Attorney DCF

Commonwealth of Massachusetts

RECEIVED

AUG 17 2020

MAURA S. DOYLE CLERK  
OF THE SUPREME JUDICIAL COURT  
FOR SUFFOLK COUNTY

Facts

Trial Judge Kenneth J King is mad a law student is helping me. The trial judge made me attorney of record when he denied my motion for appointment of counsel and when a law student who happens to know more about law than I do began helping me the trial judge wrote an order, within one hour of learning of this knowledge, that usurps that law students right as well as my own right to such help. This is a clear indication the trial judges decision was in bad faith.

20f2 sue

## Argument

Carla Marie Conferto was appointed ineffective counsel. The state is not required to give counsel in a care and protection case but once they chose to give counsel, they have to give effective counsel Halbert v Michigan.

Leslie Arsenault appointed as counsel is a conflict of interest resulting in a total denial of counsel Strickland v Washington. Trial Judges decision to deny the motion for appointment of counsel is a denial of a substantive right.

In this case there is no other effective remedy but to seek relief from the Single Justice.

## Relief Requested

Appointment of counsel. Fairness demands this is my baby twins we're talking about not some skateboards, or tires or cars - we're talking about baby twins. The right for Due Process Clause dates all the way back to Magna Carta.

By Carla Marie Conferto  
40127 Harrison Avenue  
Unit 8x  
Boston, Massachusetts

12th August 2020



The Commonwealth of Massachusetts  
SUPREME JUDICIAL COURT  
FOR SUFFOLK COUNTY  
JOHN ADAMS COURTHOUSE  
ONE PEMBERTON SQUARE, SUITE 1300  
BOSTON, MASSACHUSETTS 02108-1707  
www.SJCCOUNTYCLERK.COM  
September 9, 2020

MAURA S. DOYLE  
CLERK

CASE INFORMATION (617) 557-1100  
FACSIMILE (617) 557-1117  
ATTORNEY SERVICES (617) 557-1050  
FACSIMILE (617) 557-1055

Carla Marie Conforto, Pro Se  
1127 Harrison Avenue  
Unit 6  
Roxbury, MA 02119-3665

RE: No. SJ-2020-0578

IN RE: IMPOUNDED CASE

In accordance with the Rules of Appellate Procedure, Nos. 9(e) and 10(a) and (b), the enclosed copy of the Notice of Appeal and the Notice of Assembly of the Record on Appeal or on Reservation and Report to the Full Court in the above-entitled case are hereby mailed to you.

The appealing party must enter the case in the Supreme Judicial Court for the Commonwealth:

a) if the appeal is subject to S.J.C. Rule 2:21 (copy attached), within fourteen (14) days of the filing of the notice of appeal;

OR

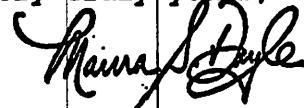
b) if the appeal is subject to Mass. R.A.P. 10(a) and (b), within ten (10) days of the receipt of this notice.

Entry of the case will be made in the Clerk's Office, Supreme Judicial Court for the Commonwealth, John Adams Courthouse, One Pemberton Square, Room 1400, Boston, Massachusetts 02108-1724, upon receipt of the filing fee of \$300.00, or upon written request if the appealing party has been permitted to proceed without payment of fees

in this court.

A copy of the record is available from this office for a fee of  
\$.20 per page.

Very truly yours,



Maura S. Doyle, Clerk

To: Carla Marie Conforto  
Middlesex Juvenile Court / Camb  
Clerk - SJC for the Commonwealth

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPREME JUDICIAL COURT  
FOR SUFFOLK COUNTY  
No. SJ-2020-0578

IN RE: CARLA MARIE CONFORTO

DETERMINATION REGARDING FEES AND COSTS BY CLERK

Name of Applicant: Carla Marie Conforto

Address:

FORTHWITH DETERMINATION BY CLERK

ALLOWED FORTHWITH. The applicant's affidavit appears regular and complete on its face, indicates that the applicant is indigent, and requests waiver, substitution or payment by the Commonwealth of normal fees and costs only. Pursuant to G.L. c. 261, s. 27C(2), the application is therefore ALLOWED forthwith without hearing, and the normal fees and costs indicated in the application are:

WAIVED IN FULL

TO BE PAID BY THE COMMONWEALTH IN THE AMOUNT OF  
\$ \_\_\_\_\_

**REFERRED TO A JUDGE.** The applicant's affidavit does not satisfy all conditions of s. 27C(2), and is therefore referred to a judge pursuant to s. 27C(3), because:

- The affidavit is not regular and complete on its face.
- The affidavit does not indicate that the applicant is indigent with the meaning of s. 27A.
- The affidavit requests waiver, substitution or payment by the Commonwealth of extra fees and costs.

**Comments:**

Describe fees and costs waived:

\$315.00 Filing Fee and service

  
Assistant Clerk

Dated: August 18, 2020

**Nicole Sasso**

---

**From:** Donna Wardynski <[donna.wardynski@jud.state.ma.us](mailto:donna.wardynski@jud.state.ma.us)>  
**Sent:** Tuesday, September 1, 2020 9:18 AM  
**To:** Sasso, Nicole  
**Subject:** FW: Straight docketing Fwd: Follow-up SJ 2020-0578

*Donna Wardynski*

Bar Docket Coordinator  
Supreme Judicial Court for the County of Suffolk  
Office of Clerk Maura S. Doyle  
One Pemberton Square - Suite 1300  
Boston, Massachusetts 02108  
617-557-1111

**From:** Amy Stewart [mailto:[amy.stewart@jud.state.ma.us](mailto:amy.stewart@jud.state.ma.us)]  
**Sent:** Tuesday, September 1, 2020 9:05 AM  
**To:** Donna Wardynski <[donna.wardynski@jud.state.ma.us](mailto:donna.wardynski@jud.state.ma.us)>  
**Subject:** Straight docketing Fwd: Follow-up SJ 2020-0578

Please docket. Ty.

Sent from my iPhone

Begin forwarded message:

**From:** [returnmypropertynow@protonmail.com](mailto:returnmypropertynow@protonmail.com)  
**Date:** August 31, 2020 at 4:41:12 PM EDT  
**To:** "[amy.stewart@jud.state.ma.us](mailto:amy.stewart@jud.state.ma.us)" <[amy.stewart@jud.state.ma.us](mailto:amy.stewart@jud.state.ma.us)>  
**Subject:** Follow-up SJ 2020-0578  
**Reply-To:** [returnmypropertynow@protonmail.com](mailto:returnmypropertynow@protonmail.com)

Hello Amy,

On August 31, 2020 a Total of six emails were sent from:  
[returnmypropertynow@protonmail.com](mailto:returnmypropertynow@protonmail.com)

Confirm receipt that all attachments, documents were received successfully.

- Appendix, Petition including Certificate of Service and Affidavit - 6 attachments
- Docket 19CP0037CA - 10 attachments
- Docket cont'd 19CP0037CA - 10 attachments
- Docket 19CP0037CA, Exhibits A,B,C,D - 9 attachments

- Exhibit E - 1 attachment
- Order re "legal advisor" - 4 attachments

Regards

Sent with ProtonMail Secure Email.



The Commonwealth of Massachusetts

SUPREME JUDICIAL COURT

FOR SUFFOLK COUNTY

JOHN ADAMS COURTHOUSE

ONE PEMBERTON SQUARE, SUITE 1300

BOSTON, MASSACHUSETTS 02108-1707

WWW.SJCCOUNTYCLERK.COM

MAURA S. DOYLE

CLERK

September 9, 2020

CASE INFORMATION (617) 557-1100

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ATTORNEY SERVICES (617) 557-1050

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Carla Marie Conforto, Pro Se  
1127 Harrison Avenue  
Unit 6  
Roxbury, MA 02119-3665

RE: No. SJ-2020-0578

IN RE: IMPOUNDED CASE

NOTICE OF ASSEMBLY OF THE RECORD  
ON APPEAL OR ON RESERVATION AND REPORT TO THE FULL COURT

In accordance with the Rules of Appellate Procedure, Rule 9(e), notice this day has been sent to the Clerk of the Supreme Judicial Court for the Commonwealth, along with two (2) certified copies of the docket entries. The record has been fully assembled in the office of the Clerk of the Supreme Judicial Court for Suffolk County.

The appealing party must enter the case in the Supreme Judicial Court for the Commonwealth:

- a) if the appeal is subject to Mass. R. A. P. 10(a) and (b), within ten (10) days of receipt of this notice;  
OR
- b) if the appeal is subject to S.J.C. Rule 2:21 (copy attached) within fourteen (14) days of the filing of the notice of appeal.

This notice does not constitute entry in the Supreme Judicial Court for the Commonwealth.

A handwritten signature in black ink, appearing to read "Maura S. Doyle".  
Maura S. Doyle, Clerk

**RULE 2:21 APPEAL FROM SINGLE JUSTICE DENIAL OF RELIEF ON**

**INTERLOCUTORY RULING**

**(Applicable to civil and criminal cases)**

(1) When a single justice denies relief from a challenged interlocutory ruling in the trial court and does not report the denial of relief to the full court, the party denied relief may appeal the single justice's ruling to the full court. Unless the court otherwise orders, the notice of appeal shall be filed with the Clerk of the Supreme Judicial Court for Suffolk County within seven days of the entry of the judgment appealed from. Unless the single justice or the full court orders otherwise, neither the trial nor the interlocutory ruling in the trial court shall be stayed.

(2) The appeal shall be presented to the full court on the papers filed in the single justice session, including any memorandum of decision. Nine copies of the record appendix must be filed in the Office of the Clerk of the Supreme Judicial Court for the Commonwealth within fourteen days after the date on which the appeal is docketed in the full Supreme Judicial Court. The record appendix shall be accompanied by nine copies of a memorandum of not more than ten pages, double-spaced, in which the appellant must set forth the reasons why review of the trial court decision cannot adequately be obtained on appeal from any final adverse judgment in the trial court or by other available means. No response from the prevailing party shall be filed, unless requested by the court.

(3) This rule shall not apply to interlocutory appeals governed by Rule 15 of the Massachusetts Rules of Criminal Procedure.

(4) The full court will consider the appeal on the papers submitted pursuant to this rule, unless it otherwise orders.

\*\*\*\*\*

If an appeal from a judgment is subject to S.J.C Rule 2:21, set forth above, please note that:

1) within seven (7) days of the entry of the judgment, (unless the court otherwise orders), the appealing party must file a notice of appeal with the Clerk of the Supreme Judicial Court for Suffolk County; AND

2) within fourteen (14) days of the date of the filing of the notice of appeal, the appealing party must:

- docket the appeal in the office of the Clerk of the Supreme Judicial Court for the Commonwealth and pay any docket fee required by law; AND

3) within fourteen (14) days of the docketing of the appeal in the office of the Clerk of the Supreme Judicial Court for the Commonwealth, the appealing party must:

- file nine (9) copies of the memorandum and nine (9) copies of the record appendix with the Clerk of the Supreme Judicial Court for the Commonwealth.

**Courtney O'Loughlin**

---

**From:** Amy Stewart <amy.stewart@jud.state.ma.us>  
**Sent:** Wednesday, September 2, 2020 8:02 AM  
**To:** Courtney O'Loughlin  
**Cc:** Nicole Sasso; Burke, James  
**Subject:** FW: SJ-2020-0578 In Re Carla Marie Conforto APPENDIX, PETITION, AFFIDAVIT  
**Attachments:** 3C436E87-5F4C-4504-BC71-0F6B40573338.jpeg; E889AD0F-3AEE-4AD2-8232-95C627E86773.jpeg; A6682A51-5E13-4DDC-8FFE-D66F0676662A.jpeg; 736938E5-7901-4772-AE7C-1D6E2CC13B5E.jpeg; 6C7051D6-334C-43FC-9367-E1888CDA49CE.jpeg; 22D660CE-2810-4068-989E-CEE12D0D17AF.jpeg

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good morning!

Courtney: I've received several emails from Carla Marie Conforto (you may remember her as Akkima's friend). She has a case SJ-2020-0578 and is seeking to file additional papers in the case. Unfortunately, she keeps sending everything as Jpeg files. Could you please print the emails and attachments (I will forward to you) and docket them in SJ-2020-0578? Also could you please try to upload the papers to LiveLink?

Donna is out today due to a death in her extended family so I am hopeful that you may have capacity to help me today. If not, please let me know and I will work with Nikki instead although I know she is supporting Eric today.

Thank you,  
Amy

Amy C. Stewart  
Second Assistant Clerk  
Office of Clerk Maura S. Doyle  
Supreme Judicial Court for the County of Suffolk  
(617) 557-1184 (direct)  
[Amy.Stewart@jud.state.ma.us](mailto:Amy.Stewart@jud.state.ma.us)

\*\* Please refer to the Clerk's Office's FAQ during the COVID-19 crisis for answers to common filing and procedural questions.  
<https://www.mass.gov/guides/sjc-clerks-office-for-the-county-of-suffolk-faqs-during-the-covid-19-crisis#single-justice-matters->

From: returnmyproperty [mailto:returnmyproperty@protonmail.com]  
Sent: Monday, August 31, 2020 3:17 PM

**To: Amy Stewart <amy.stewart@jud.state.ma.us>**  
**Subject: SJ-2020-0578 In Re Carla Marie Conforto APPENDIX, PETITION, AFFIDAVIT**

Hello Amy,

I received your email and will send the rest of the CASE according to the APPENDIX (Table of Contents). When I figure out how to label attachments using this software/device I will certainly do so.

Attached:

**APPENDIX 1p**  
**PETITION FOR EXTRAORDINARY RELIEF 2p**  
**AFFIDAVIT 3p**

Regards,  
Carla Marie Conforto

Sent with ProtonMail Secure Email.

SUPREME JUDICIAL COURT

1st2 SJC

Suffolk ss

Single Justice

SJ 2020 0578

In Re Carla Marie Conforto

PETITION FOR EXTRAORDINARY RELIEF c21/53

Introduction

Trial Judge will not appoint counsel. This decision does not satisfy due process clause. Insofar as Hobart v. Michigan held that once counsel appointed its the duty of the state to provide effective counsel.

Jurisdiction

Jurisdiction is conferred upon this court under the courts common law and Constitutional powers. Secondary jurisdiction is M.G.L.c 211#3.

Parties

Carla Marie Conforto Mother

Leslie Martin Attorney DCF

Commonwealth of Massachusetts

Facts

Trial Judge Kenneth J King is now a law student is helping me. The trial judge made me attorney of record when he denied my motion for appointment of counsel and when a law student who happens to know more about law than I do began helping me the trial judge wrote an order, within a one hour of learning of this knowledge, that usurps that law students right as well as my own right to such help. This is a clear indication the trial judges decision was in bad faith.

APPENDIX

Table of Contents

PETITION FOR EXTRAORDINARY RELIEF 21183 2 pages

AFFIDAVIT OF INDIGENCY 2 pages

19CPM57A MASSACHUSETTS MIDDLESEX COUNTY PUBLIC DOCKET REPORT 22 pages

AFFIDAVIT IN SUPPORT OF MOTION FOR APPT OF COUNSEL 3 pages

EXHIBITS A, B, C, D, E

A 7-22-20 ORDER re: Hobens Corp. UNITED STATES DISTRICT COURT 3 pages

B 7-17-20 ORDER re: TRIAL PARTICIPATION MIDDLESEX JUVENILE 1 page

C 7-17-20 ORDER re: APPOINTMENT OF COUNSEL APPEALS COURT 2 pages

D 7-15-20 ORDER re: MOTION TO DISCHARGE COUNSEL MIDDLESEX JUV 2 pages

E 7-15-20 ORDER re: MOTION TO WITHDRAW COUNSEL MIDDLESEX JUV 9 pages

CERTIFICATE OF SERVICE 1 page

20F250  
SJ-2020-057B

Argument

Carla Marie Conforto was appointed ineffective counsel.  
The state is not required to give counsel in a care and protection  
case but once they chose to give counsel, they have to give  
effective counsel. Halbert v Michigan.

Leslie Arsenault appointed as counsel is a conflict of interest  
resulting in a total denial of counsel. Strickland v Washington  
Trial Judge's decision to deny the motion for appointment of counsel  
is a denial of a substantive right.

In this case there is no other effective remedy but to seek relief  
from the Single Justice.

Relief Requested

Appointment of counsel. Fairness demands, this is  
my baby twins we're talking about not some skateboard  
or tires or car - we're talking about baby twins.  
The right for Due Process Clause dates all the way back to Magna Carta.

By Carla Marie Conforto  
91127 Harvard Avenue  
Unit 56  
Boston, Massachusetts  
12th August 2020

CERTIFICATE OF SERVICE  
I certify I served a copy of all papers August 12, 2020, By Carla Marie Conforto

AFFIDAVIT

35 2020.0578

1 of 3

IN SUPPORT OF MOTION FOR APPOINTMENT OF COUNSEL

Carla Marie Conforto, Mother, states:

1) I am the Mother of the above captioned matter. I make this affidavit January 6, 2020 on courthouse steps 121 Third Street Cambridge Massachusetts having become aware Leslie Aacanault was not communicating with me due to an extreme conflict of interest to include animosity over a relationship between her, her daughter and my family members of sexual and violent nature. She informed me on this date she will address with the judge.

She never told Judge Kenneth J. King the extent of her conflict further refusing to communicate with me through May 2020 and in front of judge Leslie Aacanault failed to disclose the above in violation of her canon of ethics

2) June 2020 an individual informed me that such an extreme conflict of interest amounts to the denial of counsel  
US Const Amend 6 Art 12 Mass Doc of Rights

3) The extent of the infringement on my Constitutional Rights could not have been known

2 of 3 HFF 4) The judge denied a second subsequent motion for appointment  
BT-2020-0578 of counsel

5) This is a clear violation of a substantive right

6) There is no other expressed remedy applied.

7) Without Single Justice intervention the risk of erroneous  
deprivation of Petitioner's interests under Const. Amend. 6, 14,  
is too high to be Constitutionally tolerable.

8) On July 17, 2020 the Middlesex Juvenile Court kept me hanging  
up on me when I called it half ten times

9) On July 17, 2020 when I was granted access to the  
juvenile court they kept me on hold for one hour  
blocking my access to the court during an  
ongoing trial

10) A law student helping me heard this and  
when the judge knew I was being helped by a  
law student he threw a fit (Bounds v. Smith)

11) Subsequent to the above infringements on my access to  
the court I resubmitted a motion for appointment of counsel  
(See exhibits.)

Aff.

Sif 3 12 The second motion for appointment of counsel was  
SJ-2020-058 denied

13 The trial judge tried to "appoint" a legal advisor  
14 The judge is supposed to appoint counsel

Signed pursuant to 18 USC § 1746, under penalty of perjury, the foregoing  
is true and accurate.

31 August 2020 By: Carla Marie Cadete

**Courtney O'Loughlin**

---

**From:** Amy Stewart <amy.stewart@jud.state.ma.us>  
**Sent:** Wednesday, September 2, 2020 8:04 AM  
**To:** Courtney O'Loughlin  
**Subject:** FW: SJ-2020-0578 In Re Carla Marie Conforto Docket, Exhibits  
**Attachments:** 26DEA11D-A785-4617-B2D7-91665A07DA6C.jpeg; 590D8E95-47F4-4BDS-A0B7-F63F51A3004E.jpeg; F1556842-076D-4D2E-97B4-13F84A3C94C2.jpeg; A51B25B6-84DA-4D0F-B0BE-682CF0F664EE.jpeg; 3FDEA4D2-A2E3-4541-A46D-AACD1839F3A.jpeg; 0A8F8COA-E683-4625-9F8D-F80A9A3472F4.jpeg; BAE5A5AD-DFFA-4EA1-BEF5-986EE3C4CD3B.jpeg; 30CFE3F3-59E8-4E39-B3E7-EF8B502DC511.jpeg; 2E5E5EA9-C07D-4EE5-84EF-B40605F8E5CA.jpeg

Please see my prior email. Attached are additional filings from Conforto to be docketed in SJ-2020-0578. Ty.

**Amy C. Stewart**  
Second Assistant Clerk  
Office of Clerk Maura S. Doyle  
Supreme Judicial Court for the County of Suffolk  
(617) 557-1184 (direct)  
[amy.stewart@jud.state.ma.us](mailto:amy.stewart@jud.state.ma.us)

**\*\* Please refer to the Clerk's Office's FAQ during the COVID-19 crisis for answers to common filing and procedural questions.**

<https://www.mass.gov/guides/sjc-clerks-office-for-the-county-of-suffolk-faqs-during-the-covid-19-crisis#-single-justice-matters->

**From:** returnmypropertynow [mailto:[returnmypropertynow@protonmail.com](mailto:returnmypropertynow@protonmail.com)]  
**Sent:** Monday, August 31, 2020 4:12 PM  
**To:** amy.stewart@jud.state.ma.us  
**Subject:** SJ-2020-0578 In Re Carla Marie Conforto Docket, Exhibits

Attached: Pages 21 & 22 of 22  
MASSACHUSETTS MIDDLESEX COUNTY JUVENILE COURT  
Public Docket Report 19CP0037CA total:22 pages  
pages 21& 22

EXHIBITS A, B, C, D

Sent with [ProtonMail](https://protonmail.com) Secure Email.

**Courtney O'Loughlin**

---

**From:** Amy Stewart <amy.stewart@jud.state.ma.us>  
**Sent:** Wednesday, September 2, 2020 8:04 AM  
**To:** Courtney O'Loughlin  
**Subject:** FW: SJ-2020-0578 In Re Carla Marie Conforto Exhibit E  
**Attachments:** B51D2C88-9AF5-4013-883C-9A96398FC3A1.jpeg

Please see my prior email. Attached are additional filings from Conforto to be docketed in SJ-2020-0578.

This is the last email. Ty.

**Amy C. Stewart**  
Second Assistant Clerk  
Office of Clerk Maura S. Doyle  
Supreme Judicial Court for the County of Suffolk  
(617) 557-1184 (direct)  
[Amy.Stewart@jud.state.ma.us](mailto:Amy.Stewart@jud.state.ma.us)

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<https://www.mass.gov/guides/sjc-clerks-office-for-the-county-of-suffolk-faqs-during-the-covid-19-crisis#-single-justice-matters->

**From:** returnmypropertynow [mailto:[returnmypropertynow@protonmail.com](mailto:returnmypropertynow@protonmail.com)]  
**Sent:** Monday, August 31, 2020 4:23 PM  
**To:** amy.stewart@jud.state.ma.us  
**Subject:** SJ-2020-0578 In Re Carla Marie Conforto Exhibit E

Attached:  
**EXHIBIT E**  
**ORDER RE MOTION TO WITHDRAW COUNSEL**

Sent with ProtonMail Secure Email.

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS

JUVENILE COURT DEPT.  
CAMBRIDGE DIVISION  
DOCKET NO: 18CP0067CA

RE: CARE & PROTECTION OF CONFORTO-PETITION-GUIRAND CHILDREN

MOTION TO WITHDRAW AS STAND-BY COUNSEL

NOW COMES attorney Leslie J. Arsenault, stand-by counsel for Carla Marie Conforto, mother of the children in the above Care and Protection, who respectfully requests this Honorable Court to allow her Motion to Withdraw as stand-by counsel in this matter.

In support of this motion, counsel submits the attached Affidavit of Leslie J. Arsenault.

WHEREFORE, Attorney Leslie J. Arsenault, respectfully requests that this court grant her Motion to Withdraw and to allow client, Carla Marie Conforto, to obtain substitute counsel or to represent herself *pro se*.

Respectfully Submitted on July 11, 2020,

By Leslie J. Arsenault

Leslie J. Arsenault  
Leslie J. Arsenault, Esq.  
BBO# 693254  
P.O. Box 769  
Medford, MA. 02155  
(781) 690-2985  
Les58@me.com

7-14-2020  
Allow.  
J. J.  
(Leontine K. M.)

Case 1:20-cv-11352-RGS Document 8 Filed 07/22/20 Page 1 of 1

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 20-11352-RGS

CARLA MARIE CONFORTO

v.

COMMISSIONER LINDA S. SPEARS

**FINAL ORDER OF DISMISSAL**

In accordance with the Order dated July 22, 2020, dismissing this action for the reasons stated therein, it is hereby ORDERED that the above-captioned matter is dismissed in its entirety.

Date: 7/22/2020

/s/ Richard G. Stearns

UNITED STATES DISTRICT JUDGE

Commonwealth of Massachusetts

Motion No. 83

No. 19 CPCASTC,1

Care and Protection of Desiree, Oliver, Tatrice and Kehinde

MOTION TO DISCHARGE COUNSEL AND FOR THE APPOINTMENT OF COUNSEL

Now comes Petitioner in the above captioned matter and who does move this court for the discharge of Counsel and for appointment of new counsel.

1. Ineffective and sporadic communication with counsel has effected adequate representation Strickland v. Washington 466 U.S. 668 (1989)

2) Counsel's deficient performance has provided the Petitioner whether as to deprive her of full and fair Due and Protection process as guaranteed by the Eighth and Fourteenth Amendment and Article 12 Mass. Dec. Rights.

3) Counsel's behavior has fallen measurably below that which might be expected from an ordinary capable lawyer in the circumstances. Commonwealth v. Slocum 366 Mass. 89 (1974).

4) Appointed counsel has been rendered ineffective due to conflict of interest, due to the extreme nature due to extraneous influence of a conflict of interest. Strickland Supra at 344.

WHEREFORE as for grounds therein are recited directly in Const. Amend 6 14 and Art 12 Mass. Dec. Rights

3rd July 2020

Carla Marie Costello

Esq. Esquire or Attorney  
Identified and sworn to before me and affiant on 3rd day of July, 2020

7112 Hartwell Avenue Unit 808  
Boston, Massachusetts

7/14/2020

Allowed as to be discharge of  
appointment of new counsel.

David A. O'Boyle  
Commonwealth Lawyer

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS

JUVENILE COURT DEPARTMENT  
CAMBRIDGE DIVISION  
NO. 19 CP 0037 CA

In Re: OLIVIER PETION )  
DOB: 3/6/2006 )  
DESIREE PETION )  
DOB: 8/12/2004 )  
EVA ARIANE GUIRAND ) ORDER REGARDING CARLA MARIE  
aka BABY GIRL CONFORTO, ) CONFORTO'S PARTICIPATION IN THE  
aka KEIJNDE ARJEN ) TRIAL OF THIS MATTER  
aka EVA CONFORTO )  
DOB: 7/10/2017 )  
STEVE ARJEN GUIRAND )  
aka BABY BOY CONFORTO, )  
aka TAEWOO ARJEN, )  
aka STEVE CONFORTO )  
DOB: 7/09/2017 )

Following a hearing on July 17, 2020, it is hereby ORDERED, that if the mother of the minor children, Carla Marie Conferto, seeks to participate in the ongoing trial of this matter, she must appear in person at the Cambridge Juvenile Court, 121 Third St., Cambridge, MA for every hearing in this case. This Order is necessary based on the fact that on July 17, 2020 Carla Marie Conferto called into the ongoing trial with a third person, who identified himself as Arthur Burnham, a self-described student of the law, listening in to assist her. Mr. Burnham did not identify himself as a lawyer and has not filed an appearance in this case. When told that the proceedings are confidential and that a third party cannot listen in, Carla Marie Conferto repeatedly refused to take her phone off speaker and Mr. Burnham could be heard advising Carla Marie Conferto on what to say in response to this Court's questions and comments and other counsel's arguments throughout the balance of the hearing. Therefore, I conclude that it is necessary to have Carla Marie Conferto physically present in the courthouse and in the courtroom during the continued trial proceedings, to ensure the confidentiality of the proceedings.

This trial will resume on July 27 at 10:00 AM and will continue on July 28 at 9:00 AM. If Carla Marie Conferto is not present, she will be deemed to have forfeited her right to participate in these proceedings.

SO ORDERED.

DATED: July 17, 2020

  
Kenneth J. King, Associate Justice,  
Middlesex County Juvenile Court

Commonwealth of Massachusetts

Care and Protection of Deanne, Cherie, Tamie and Kelsinde

**AFFIDAVIT**

1. Carla Maria Confero, being duly sworn states

- 2) I am the petitioner in the above entitled matter. I make this statement in support of this motion to disbarre counsel and for our cause to be appointed new counsel.
- 3) There exists a conflict of interest with current appointed counsel.
- 4) Upon information and belief appointed counsel Leslie Averaoult was previously involved with a legal and/or legal inadvisories with a family member of my own.
- 5) Upon information and belief Leslie Averaoult was used by a family member of my own and such layout created animosity which interferes with effective representation.
- 6) To date counsel has not effectively communicated with this petitioner and has not zealously defended this petitioner of her rights such as visitation.
- 7) This petitioner is entitled to effective counsel under the Sixth Amendment to United States Constitution Art 12 of Mass Decl of Rights
- 8) Counsel failed to tell me visits changed and caused

Signed pursuant to 28 USC § 1746, I declare under penalty of perjury the foregoing is true and accurate.

2nd July 2020

Carla Maria Confero

COMMONWEALTH OF MASSACHUSETTS

APPEALS COURT CLERK'S OFFICE  
John Adams Courthouse  
One Pemberton Square, Suite 1200  
Boston, Massachusetts 02108-1705  
(617) 725-8106

July 16, 2020

RE: No. 2020-J-0310  
Carla Marie Conforto, Pro Se  
c/o 1127 Harrison Avenue  
Unit 6  
Roxbury, MA 02119

Lower Ct. No.: 19CP0037CA

**DEPARTMENT OF CHILDREN AND FAMILIES & others**  
vs.  
**MOTHER & others**

NOTICE OF DOCKET ENTRY

Please take note that on July 16, 2020, the following entry was made on the docket of the above-referenced case:

ORDER: The mother in a child welfare matter pending before the Cambridge Juvenile Court has filed a petition, pursuant to G. L. c. 231, § 118, first para., seeking review of the order denying her motion to appoint successor counsel. To succeed, the mother's petition and supporting materials must demonstrate that the Juvenile Court judge's order allowing standby counsel's motion to withdraw and the mother's motion to discharge counsel, but denying the mother's motion to appoint successor counsel, was the product of a clear error of law or abuse of discretion. See *Jet-Line Services, Inc. v. Board of Selectmen of Stoughton*, 25 Mass. App. Ct. 645, 646 (1988). My authority to overrule an interlocutory order of a trial court judge should "be exercised in a stinting manner with suitable respect for the principle that the exercise of judicial discretion circumscribes the scope of available relief." *Edwin Sage Co. v. Foley*, 12 Mass. App. Ct. 20, 25 (1981).

"[A] parent may waive the right to counsel either explicitly" or "through conduct." *Adoption of Raissa*, 93 Mass. App. Ct. 447, 452 (2018). I note that "[t]he key to waiver by conduct is misconduct occurring after an express warning has been given to the [parent] about the [parent's] behavior and the consequences of proceeding without counsel." *Id.* I further note that, while it is within the judge's sound discretion whether to grant a request for new counsel on the eve of trial, "the judge should make findings showing a balancing between the [parent's] rights and the interests of the" public and the child "and demonstrating that discretion was in fact exercised." *Commonwealth v. Carcetti*, 53 Mass. App. Ct. 558, 561 (2000). Here, based upon the limited record before me, I am unable to discern either an error of law or an abuse of discretion in the judge's order denying the mother's request for successor counsel on the eve of trial and in light of the mother's history with appointed counsel as demonstrated by the Juvenile Court's docket.



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07/15/2020	Motion allowed Release of prior hearing testimony to incorporate into on going trial.	King
07/15/2020	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J	King

I HEREBY CERTIFY THAT THIS DOCUMENT IS  
A TRUE COPY OF A DOCUMENT FILED WITH THE  
OFFICE OF THE CLERK-MAGISTRATE OF THIS COURT

*Elizabeth Shreeby*  
Clerk-Magistrate

Printed: 07/16/2020 9:03 am

Case No: 19CP0037CA

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05/11/2020	Mother present in Court. Judge: King, Hon. Kenneth J.	King
05/11/2020	Father not present. Judge: King, Hon. Kenneth J.	King
05/11/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
05/11/2020	Motion allowed expedited homestudy.	King
05/11/2020	Court issues order no action taken on motion for restraining order to prevent DCF from removing child from current placement- but absent an emergency, DCF to give parties 10 days notice- see motion as endorsed.	King
07/07/2020	Probation homestudy filed.	
07/09/2020	Affidavit of Olivier Petion filed.	
07/09/2020	Request to Leslie Martin filed.	
07/09/2020	Motion filed Compel the commonwealth for the entire court record.	
07/09/2020	Motion filed Discharge counsel and for appointment of counsel.	
07/09/2020	Affidavit filed.	
07/09/2020	Motion filed Compel the commonwealth to facilitate petitioner access to her biological children via visitation.	
07/09/2020	Affidavit filed.	
07/13/2020	Motion filed Motion to Withdraw and Affidavit.	
07/13/2020	Stipulation of Facts of Desiree Petion filed.	King
07/13/2020	Supplemental Witness and Exhibit List Since June 5, 2020 on behalf of the Minor child, Desiree Petion filed.	King
07/14/2020	Court issues order Case heard via ZOOM due to COVID19 emergency.	King
07/14/2020	Mother present in Court. Judge: King, Hon. Kenneth J.	King
07/14/2020	Motion allowed Atty Arsenaults motion to withdraw.	King
07/14/2020	Attorney removed/appearance vacated on behalf of mother. Judge: King, Hon. Kenneth J.	King
07/14/2020	Motion allowed to discharge counsel and for the appointment of counsel.	King
07/14/2020	Motion allowed in part Allowed as to discharge, denied as to appointment of new counsel.	King
07/14/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
07/14/2020	Court issues order hearing stayed until 7/15/2020 @2pm.	King
07/14/2020	amended affidavit of Olivier Petion filed.	King
07/15/2020	Court issues order Case heard via ZOOM due to COVID19 emergency.	King
07/15/2020	Father not present. Judge: King, Hon. Kenneth J.	King
07/15/2020	Mother present in Court. Judge: King, Hon. Kenneth J.	King

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MIDDLESEX COUNTY JUVENILE COURT  
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SEP 03 2020

MAURA S. DOYLE CLERK  
OF THE SUPREME JUDICIAL COURT  
FOR SUFFOLK COUNTY

18CP0037CA In the Matter of: Petion et. al., Guirand et. al.

CASE TYPE: Care & Protection	FILE DATE: 02/21/2019
ACTION CODE: INCP	CASE TRACK:
DESCRIPTION: Care and Protection Petition, G.L. c. 118, § 24	
CASE DISPOSITION DATE: 03/20/2020	CASE STATUS: Suspended-Covid-19
CASE DISPOSITION: Pending	STATUS DATE: 02/21/2019
CASE JUDGE: King, Kenneth J.	CASE SESSION:

BCM TRACK		
Ticket Description	Due Date	Completion Date
Investigator Report Due	07/12/2019	08/05/2019

PARTIES		
Petitioner DCF - Arlington Dept. of Children & Families 30 Mystic Street Arlington, MA 02474	DCF Attorney Leslie Marie Martin Department of Children and Families Department of Children and Families 30 Mystic St Arlington, MA 02474-1155 Work Phone (781) 641-8250 Added Date: 05/29/2020	698843
Child Guirand, Eva Ariane 3780 Mystic Valley Parkway Apt. 227 Medford, MA 02155	Appointed CP/CHINS/CRA/GU Karin Wilinski Karin Wilinski, Attorney at Law Karin Wilinski, Attorney at Law 233 Needham St Suite 300 Newton Upper Falls, MA 02484 Work Phone (617) 628-7711 Added Date: 02/22/2019	565178
Child Guirand, Steve Arjan 3780 Mystic Valley Parkway Apt. 227 Medford, MA 02155	Appointed CP/CHINS/CRA/GU Karin Wilinski Karin Wilinski, Attorney at Law Karin Wilinski, Attorney at Law 233 Needham St Suite 300 Newton Upper Falls, MA 02484 Work Phone (617) 628-7711 Added Date: 02/22/2019	565178

Printed: 09/03/2020 9:57 am	Case No: 18CP0037CA	Page: 1
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Child Petion, Desiree Penelope 3780 Mystic Valley Parkway Apt. 227 Medford, MA 02155	Appointed CP/CHINS/CRA/GU M. Therese Roche Law Offices of M. Therese Roche Law Offices of M. Therese Roche 171 Swanton St Suite 9 Winchester, MA 01890 Work Phone (781) 721-4733 Added Date: 03/11/2019	423810
Child Petion, Olivier 3780 Mystic Valley Parkway Apt. 227 Medford, MA 02155	Appointed CP/CHINS/CRA/GU Joan M Altamore Joan M. Altamore, Esquire Joan M. Altamore, Esquire 39 Glandower Rd Roslindale, MA 02131 Work Phone (617) 386-1719 Added Date: 03/14/2019	640468
Respondent 1 Conforto, Carla Marie c/o 1127 Harrison Avenue Unit 8 Boston, MA 02119	Appointed CP/CHINS/CRA/GU Thomas W Fothergill Law Office of Thomas W Fothergill Law Office of Thomas W Fothergill 200 Jefferson Rd Suite 208 Wilmington, MA 01887 Work Phone (781) 438-1122 Added Date: 03/07/2020	648135
Respondent 2 Guirand, Steve 28 Sylvia Court No. 1 Hyde Park, MA 02138	Appointed CP/CHINS/CRA/GU Mary M Santoro Mary M. Santoro, Attorney-at-Law Mary M. Santoro, Attorney-at-Law P O Box 938 Medford, MA 02155-0010 Work Phone (781) 391-3771 Added Date: 03/07/2019	558432
Respondent 2 Petion, Andre G 39 Maple Street Unit 404 Hyde Park, MA 02138		

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EVENTS				
Date	Session	Event	Result	Resulting Judge
03/04/2019	Cambridge Session	Preliminary Hearing (CV)	Rescheduled	King
03/05/2019	Cambridge Session	Preliminary Hearing (CV)	Held	King
03/07/2019	Cambridge Session	Warrant/Precept Hearing	Held	King
03/11/2019	Cambridge Session	Temporary Custody Hearing	Rescheduled	King
03/11/2019	Cambridge Session	Preliminary Hearing (CV)	Held	King
03/14/2019	Cambridge Session	Temporary Custody Hearing	Rescheduled	King
03/18/2019	Cambridge Session	Preliminary Hearing (CV)	Held	King
03/21/2019	Cambridge Session	Temporary Custody Hearing	Held	King
03/25/2019	Cambridge Session	Warrant/Precept Hearing	Held	King
03/25/2019	Cambridge Session	Temporary Custody Hearing	Rescheduled	King
03/25/2019	Cambridge Session	Report	Rescheduled	King
03/27/2019	Cambridge Session	Temporary Custody Hearing	Held	King
03/27/2019	Cambridge Session	Report	Held	King
04/12/2019	Cambridge Session	Motion Hearing	Held	King
04/16/2019	Cambridge Session	Motion Hearing	Held	King
04/18/2019	Cambridge Session	Temporary Custody Hearing	Held	King
06/13/2019	Cambridge Session	Status Hearing	Held	King
07/17/2019	Cambridge Session	Motion Hearing	Held	King
07/18/2019	Cambridge Session	Report	Held	King
07/25/2019	Cambridge Session	Motion Hearing	Held	King
08/12/2019	Cambridge Session	Report	Held	King
10/04/2019	Cambridge Session	Motion Hearing	Held	King
10/24/2019	Cambridge Session	Motion Hearing	Held	King
11/15/2019	Cambridge Session	Report	Rescheduled	King
11/26/2019	Cambridge Session	Report	Held	King
01/03/2020	Cambridge Session	Motion Hearing	Held	King
01/13/2020	Cambridge Session	Motion Hearing	Held	King
01/23/2020	Cambridge Session	Report	Held	King
02/08/2020	Cambridge Session	Pre Trial Conference (CR/CV)	Held	King
02/08/2020	Cambridge Session	Other Hearing	Held	King
03/09/2020	Cambridge Session	Permanency Hearing	Rescheduled	King
03/09/2020	Cambridge Session	Hearing on Merits (CR/CV)	Held - NDCP Trial	King
03/12/2020	Cambridge Session	Hearing on Merits (CR/CV)	Rescheduled	King



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03/12/2020	Cambridge Session	Permanency Hearing	Rescheduled	King
03/13/2020	Cambridge Session	Hearing on Merits (CR/CV)	Rescheduled	King
03/23/2020	Cambridge Session	Warrant/Precept Hearing	Held	Tan
03/23/2020	Cambridge Session	Hearing on Merits (CR/CV)	Rescheduled-Covid-19 emergency	King
03/24/2020	Cambridge Session	Hearing on Merits (CR/CV)	Rescheduled-Covid-19 emergency	King
03/25/2020	Cambridge Session	Hearing on Merits (CR/CV)	Rescheduled-Covid-19 emergency	King
03/28/2020	Cambridge Session	Hearing on Merits (CR/CV)	Rescheduled-Covid-19 emergency	King
03/30/2020	Cambridge Session	Warrant/Precept Hearing	Held	Tan
05/18/2020	Cambridge Session	Other Hearing	Rescheduled	King
05/26/2020	Cambridge Session	Other Hearing	Rescheduled-Covid-19 emergency	Tan
05/28/2020	Cambridge Session	Other Hearing	Held	King
06/11/2020	Cambridge Session	Other Hearing	Held	King
07/14/2020	Cambridge Session	Hearing on Merits (CR/CV)	Held - NOCP Trial	King
07/15/2020	Cambridge Session	Hearing on Merits (CR/CV)	Held - NOCP Trial	King
07/17/2020	Cambridge Session	Hearing on Merits (CR/CV)	Held - NOCP Trial	King
07/27/2020	Cambridge Session	Hearing on Merits (CR/CV)	Held - NOCP Trial	King
07/28/2020	Cambridge Session	Hearing on Merits (CR/CV)	Held - NOCP Trial	King
08/03/2020	Cambridge Session	Hearing on Merits (CR/CV)		
08/10/2020	Cambridge Session	Hearing on Merits (CR/CV)		
08/21/2020	Cambridge Session	Hearing on Merits (CR/CV)		
08/22/2020	Cambridge Session	Hearing on Merits (CR/CV)		
08/23/2020	Cambridge Session	Hearing on Merits (CR/CV)		



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M. LEXICO COUNTY JUVENILE COURT  
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## INFORMATIONAL DOCKET ENTRIES

Date	Ref	Description	Judge
02/21/2019		Petition filed.	
02/21/2019		Affidavit disclosing care and custody filed.	
02/21/2019		Affidavit of petitioner filed.	
02/21/2019		Summons for mother to issue. [FORM]	Sheehy
		Judge: Sheehy, C-M Elizabeth	
02/21/2019		Summons for father to issue. [FORM]	Sheehy
		Judge: Sheehy, C-M Elizabeth	
02/21/2019		Filed On this date Patricia M Osgood, Esq. added as Appointed CP/CHINS/CRA/GU for Respondent 1 Ceria M Conforto Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Jay D Blitzman.	
02/21/2019		Filed On this date Cindy A Fenichel, Esq. added as Appointed CP/CHINS/CRA/GU for Respondent 2 Andre G Petion Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Jay D Blitzman.	
02/22/2019		Filed On this date Karin Wilinski, Esq. added as Appointed CP/CHINS/CRA/GU to Child Olivier Petion Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Jay D Blitzman.	
02/22/2019		Filed On this date Karin Wilinski, Esq. added as Appointed CP/CHINS/CRA/GU to Child Desiree Petion Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Jay D Blitzman.	
02/22/2019		Filed On this date Karin Wilinski, Esq. added as Appointed CP/CHINS/CRA/GU to Child Baby Girl Conforto Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Jay D Blitzman.	
02/22/2019		Filed On this date Karin Wilinski, Esq. added as Appointed CP/CHINS/CRA/GU to Child Baby Boy Conforto Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Jay D Blitzman.	
03/04/2019		Mother not present. Judge: King, Hon. Kenneth J.	King
03/04/2019		Father not present. Judge: King, Hon. Kenneth J.	King



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03/04/2019	Ordered Attorneys Wilinski and Osgood not present, snowstorm.	King
03/05/2019	Precept issued for Oliver Petion, Desiree Petion, Baby Girl Conforto, Baby Boy Conforto. [FORM]	King
03/05/2019	Summons for father to issue. [FORM] Judge: King, Hon. Kenneth J.	King
03/05/2019	Court issues order petition issued.	King
03/05/2019	Mother not present. Judge: King, Hon. Kenneth J.	King
03/05/2019	Father not present. Judge: King, Hon. Kenneth J.	King
03/05/2019	Summons for witness to issue. [FORM] Judge: King, Hon. Kenneth J.	King
03/05/2019	FORM:  C&P Precept Sent On: 03/05/2019 13:14:22	
03/05/2019	FORM:  C&P Precept Sent On: 03/05/2019 13:17:15	
03/05/2019	FORM:  C&P Precept Sent On: 03/05/2019 13:17:41	
03/07/2019	Appearance of Counsel by Atty Osgood/mother filed.	
03/07/2019	Summons for mother to issue. [FORM] Judge: King, Hon. Kenneth J.	King
03/07/2019	Child before the court and identified. Judge: King, Hon. Kenneth J.	King
03/07/2019	Child excused from further hearings. Judge: King, Hon. Kenneth J.	King
03/07/2019	Precept recalled. Judge: King, Hon. Kenneth J.	King
03/07/2019	Precept returned with service. Judge: King, Hon. Kenneth J.	King
03/07/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
03/07/2019	Summons for father to issue. [FORM] Judge: King, Hon. Kenneth J.	King
03/07/2019	Filed On this date Brooke M Chen, Esq. added as DCF Attorney for Petitioner DCI - Arlington	



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03/07/2019	Summons for father to issue. [FORM]  Judge: King, Hon. Kenneth J.	King
03/07/2019	Petition amended children #3 and #4 only (Baby girl and baby boy) father, Stacie Gutrand, added to petition.	King
03/07/2019	Continuation of the child in the home is contrary to his/her best interests. Judge: King, Hon. Kenneth J.	King
03/07/2019	DCF affidavit dated 3/7/19 filed.	King
03/07/2019	Filed On this date Mary M Santoro, Esq. added as Appointed CP/CHINS/CRA/GU for Respondent 2 Stacie Gutrand Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Kenneth J King.	
03/11/2019	Notice of Special Appearance (by Mother) filed.	
03/11/2019	Motion filed to withdraw by Atty Osgood.	
03/11/2019	Attorney Brooke M Chen, Esq. enters an appearance for DCF - Arlington.	
03/11/2019	Notice of docket entry and judgment from the Supreme Judicial Court filed.	
03/11/2019	Attorney Karin Wilnsd, Esq. enters an appearance for Baby Girl Conforto, Baby Boy Conforto.  Judge: King, Hon. Kenneth J	King
03/11/2019	Attorney Cindy A Fenichel, Esq. enters an appearance for Andre G Petion.	
03/11/2019	Court issues order New and separate counsel to be appointed for Desree & Oliver.	King
03/11/2019	Attorney removed/appearance vacated on behalf of child/defendant. Judge: King, Hon. Kenneth J.	King
03/11/2019	Mother present in Court.	
03/11/2019	Petition amended mother's true name "Carla Marie Conforto".  Judge: King, Hon. Kenneth J.	King
03/11/2019	Motion allowed in part atty Osgood's motion to withdraw allowed but she is to remain as standby counsel.  Judge: King, Hon. Kenneth J.	King
03/11/2019	refused summons filed.	
03/11/2019	Court issues order mother refuses service of process, court finds mother has actual notice and has been served.  Judge: King, Hon. Kenneth J.	King
03/11/2019	Court issues order Mother may have copy of docket.  Judge: King, Hon. Kenneth J.	King
03/11/2019	Court issues order Martin's hearing conducted with mother.	King



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03/11/2019	Appearance by Atty Mary Santoro filed.	King
03/11/2019	Father present in court. Judge: King, Hon. Kenneth J.	King
03/11/2019	Personal service of summons made on father. Judge: King, Hon. Kenneth J.	King
03/11/2019	Father not present. Judge: King, Hon. Kenneth J.	King
03/11/2019	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
03/11/2019	Summons for witness to issue. [FORM] Judge: King, Hon. Kenneth J.	King
03/11/2019	Court issues order Mother ordered to produce child Desiree's address, phone and all contact information before next date, see written order in file, copy given to mother in open court.	King
03/11/2019	Filed On this date Karin Wiliński, Esq. dismissed/withdrawn as Appointed CP/CHINS/CRA/GU for Child Olivier Petion	
03/11/2019	Filed On this date Robert Thomas Owens, Esq. added as Appointed CP/CHINS/CRA/GU for Child Olivier Petion Appointed for the purpose of Care and Protection Cases c. 118, s.23(a)(3) t Judge Hon. Jay D Blitzman.	
03/11/2019	Filed On this date Karin Wiliński, Esq. dismissed/withdrawn as Appointed CP/CHINS/CRA/GU for Child Desiree Petion	
03/11/2019	Filed On this date M. Therese Roche, Esq. added as Appointed CP/CHINS/CRA/GU for Child Desiree Petion Appointed for the purpose of Care and Protection Cases c. 118, s.23(a)(3) t Judge Hon. Jay D Blitzman.	
03/12/2019	Summons for Patricia Conforto for 3/14/2019 returned with service.	
03/12/2019	Summons for Patricia Souza Conforto for 3/14/2019 returned with service.	
03/14/2019	Filed On this date Robert Thomas Owens, Esq. dismissed/withdrawn as Appointed CP/CHINS/CRA/GU for Child Olivier Petion	
03/14/2019	Filed On this date Joan M Altamore, Esq. added as Appointed CP/CHINS/CRA/GU for Child Olivier Petion Appointed for the purpose of Care and Protection Cases c. 118, s.23(a)(3) t Judge Hon. Gloria Y Tan.	
03/14/2019	Motion filed Production of records and Affidavit.	
03/14/2019	Mother present in Court. Judge: King, Hon. Kenneth J	King

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03/14/2019	Father not present. Judge: King, Hon. Kenneth J.	King
03/14/2019	special cause affidavit with attachments filed.	King
03/14/2019	Motion filed to produce records.	King
03/14/2019	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
03/15/2019	Summons for Andre Petion returned without service.	
03/18/2019	Mother present in Court. Judge: King, Hon. Kenneth J.	King
03/18/2019	Father not present. Judge: King, Hon. Kenneth J.	King
03/18/2019	order by Judge King re: Desirae filed.	King
03/18/2019	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
03/18/2019	Court issues order all counsel and mother given copy of order file by Judge King.	King
03/21/2019	Motion filed Motion to correct Scrivener's Error.	
03/21/2019	Birth certificate of child filed. [SCAN]  Applies To: Petion, Desirae (Child)	
03/21/2019	Statements (mother) filed.	
03/21/2019	Mother present in Court. Judge: King, Hon. Kenneth J.	King
03/21/2019	Father not present. Judge: King, Hon. Kenneth J.	King
03/21/2019	Court issues order mother may review prior case from this court and may have a certified copy of the docket sheet only- no further dissemination by mother.	King
03/21/2019	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
03/21/2019	Summons for father to issue. [FORM] Judge: King, Hon. Kenneth J.	King
03/21/2019	Notice of docket entry and judgment from the Supreme Judicial Court filed.	
03/25/2019	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
03/25/2019	Child/young adult present in court. Judge: King, Hon. Kenneth J.	King
03/25/2019	Child before the court and identified. Judge: King, Hon. Kenneth J.	King
03/25/2019	Child excused from further hearings. Judge: King, Hon. Kenneth J.	King



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03/25/2019	Precept recalled. Judge: King, Hon. Kenneth J.	King
03/25/2019	Precept returned with service. Judge: King, Hon. Kenneth J.	King
03/25/2019	Mother present in Court. Judge: King, Hon. Kenneth J.	King
03/25/2019	Court issues order case called back into court for afternoon session- mother and child- Desree are present in court.	King
03/25/2019	Notice of docket entry and judgment from the Supreme Judicial Court filed.	
03/27/2019	Summons for father to issue. [FORM]  Judge: King, Hon. Kenneth J Applies To: Petton, Olivier (Child); Petton, Desree (Child); Petton, Andre G (Respondent 2)	King
03/27/2019	Father present in court. Judge: King, Hon. Kenneth J	King
03/27/2019	Social Worker present. Judge: King, Hon. Kenneth J	King
03/27/2019	Colloquy with father conducted. Judge: King, Hon. Kenneth J	King
03/27/2019	Written stipulation filed by father. Judge: King, Hon. Kenneth J	King
03/27/2019	Stipulation approved by judge. Judge: King, Hon. Kenneth J	King
03/27/2019	Temporary custody hearing waived by father. Judge: King, Hon. Kenneth J	King
03/27/2019	Personal service of summons made on father. Judge: King, Hon. Kenneth J	King
03/27/2019	Father's, Andre Petton's, waiver of custody hearing filed.	King
03/27/2019	Court inquired as to whether the parties know or have reason to know that the child is an Indian child subject to ICWA. Judge: King, Hon. Kenneth J	King
03/27/2019	Parties respond no as to knowing or having reason to know that the child is an Indian child subject to ICWA. Judge: King, Hon. Kenneth J	King
03/27/2019	Written stipulation filed by father. Judge: King, Hon. Kenneth J	King
03/27/2019	Colloquy with father conducted. Judge: King, Hon. Kenneth J	King
03/27/2019	Stipulation approved by judge. Judge: King, Hon. Kenneth J	King
03/27/2019	Temporary custody hearing waived by father. Judge: King, Hon. Kenneth J	King



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03/27/2019	father's, Steve Guirand's, right to a custody hearing/right to a placement hearing reserved filed.	King
03/27/2019	Court inquired as to whether the parties know or have reason to know that the child is an Indian child subject to ICWA. Judge: King, Hon. Kenneth J.	King
03/27/2019	Parties respond no as to knowing or having reason to know that the child is an Indian child subject to ICWA. Judge: King, Hon. Kenneth J.	King
03/27/2019	Mother not present. Judge: King, Hon. Kenneth J.	King
03/27/2019	Father present in court. Judge: King, Hon. Kenneth J.	King
03/27/2019	Social Worker present. Judge: King, Hon. Kenneth J.	King
03/27/2019	Petition amended Father's address: Steve Guirand, 883 Salem Street, Malden, Ma. 02148.	King
03/27/2019	Court issues order Mother's right to a temporary custody hearing waived/Oliver's right has been reserved.	King
03/27/2019	Court issues order Investigator to be appointed with report due 03/10/19.	King
03/27/2019	Precept issued for Desiree Penelope Petion. [FORM]	King
03/27/2019	Temporary writ of habeas corpus issued to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
03/27/2019	FORM:  C&P Precept Sent On: 03/27/2019 10:05:33  Judge: King, Hon. Kenneth J.	King
03/27/2019	Determination made that DCF or its agent's efforts prior to removal were reasonable. Judge: King, Hon. Kenneth J.	King
03/28/2019	Investigator appointed: Sally Anne Kinder, Esq. appointed as Investigator On 03/28/2019 by Hon. Kenneth J. King.	King
04/04/2019	Notice of assignment and release filed.	
04/04/2019	Motion filed Hearing.	
04/12/2019	FORM:  C&P Precept Sent On: 04/12/2019 12:36:14	
04/12/2019	Mother present in Court. Judge: King, Hon. Kenneth J.	King
04/12/2019	Father not present. Judge: King, Hon. Kenneth J	King

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04/12/2019	Motion filed Childrens' motion for funds for DNA testing.	King
04/12/2019	Petition amended Baby Boy's true name: Taewoo Arjan Baby Girl's true name: Kaninde Alane.	King
04/12/2019	Court issues order Notice of intent to seek medical care after hearing accepted by the court and DCF authorized to treat.	King
	Judge: King, Hon. Kenneth J.	
04/12/2019	Mother present in Court. Judge: King, Hon. Kenneth J.	King
04/12/2019	Court issues order Notice of intent to seek medical treatment stayed until 4/16/19.	King
04/12/2019	Court issues order Mother ordered to produce Desiree by or before 4/16/19 9AM.	King
04/12/2019	Father not present. Judge: King, Hon. Kenneth J.	King
04/12/2019	Mother's document re: release and quitclaim filed.	King
04/12/2019	Mother's document re: release and quitclaim filed.	King
04/12/2019	Mother's document re: release and quitclaim filed.	King
04/12/2019	Mother's document re: release and quitclaim filed.	King
04/12/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
04/12/2019	J. King's order re: production of child filed.	King
04/16/2019	Child/young adult present in court. Judge: King, Hon. Kenneth J.	King
04/16/2019	Child before the court and identified. Judge: King, Hon. Kenneth J.	King
04/16/2019	Child excused from further hearings. Judge: King, Hon. Kenneth J.	King
04/16/2019	Continuation of the child in the home is contrary to his/her best interests. Judge: King, Hon. Kenneth J.	King
04/16/2019	Determination made that DCF or its agent's efforts prior to removal were reasonable. Judge: King, Hon. Kenneth J.	King
04/16/2019	Precept recalled. Judge: King, Hon. Kenneth J.	King
04/16/2019	Mother present in Court. Judge: King, Hon. Kenneth J.	King
04/16/2019	Father not present. Judge: King, Hon. Kenneth J.	King
04/16/2019	affidavit of Carla Marie Conforto filed.	King
04/16/2019	Motion denied quitclaim--treated as motion to return children--see motion as noted.	King



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04/16/2019	Motion allowed DNA testing.	King
04/16/2019	Court issues order mother may have copy of mittimus.	King
04/16/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
04/16/2019	recognition as a civilian (typing error updated 7/16/19) filed.	King
04/16/2019	Motion denied to restore 72 hour hearing.  Judge: King, Hon. Kenneth J.	King
04/16/2019	Motion allowed Notice of Intent to seek medical treatment- see notice for specifics.	King
04/18/2019	Mother not present. Judge: King, Hon. Kenneth J.	King
04/18/2019	Father not present. Judge: King, Hon. Kenneth J.	King
04/18/2019	Mr Rogers present in court.	King
04/18/2019	Court issues order Mr Petion waived his temporary custody hearing rights previously.	King
04/18/2019	Exhibit #1-Original Affidavit admitted.	King
04/18/2019	Court issues order Ms Conforto, mother's, right to a temporary custody hearing deemed waived.	King
04/18/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
04/18/2019	Court issues order Any pro se filings will be copied and given to Judge's Lobby for review.	King
05/10/2019	Motion filed Court Investigator's extension of time.	
05/13/2019	Mother not present. Judge: King, Hon. Kenneth J.	King
05/13/2019	Father not present. Judge: King, Hon. Kenneth J.	King
05/13/2019	Motion allowed extension of time to file Inv report. Report now due by 7/12/19.	King
05/13/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
05/13/2019	DCF report in accordance with G.L. c. 119, s. 21A filed. Judge: King, Hon. Kenneth J.	King
05/13/2019	Letter from Camey Hospital regarding Ms. Conforto's admittance filed.	
07/09/2019	Special notice of disbelief and demand filed.	
07/16/2019	Motion filed Notice of Intent to view docket/copies of case file, on going access to case file.	
07/17/2019	Motion filed Court investigator extension of time.	
07/17/2019	Motion allowed Court investigator extension of time report now due 8/2/19.	King



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07/18/2019	Mother present in Court. Judge: King, Hon. Kenneth J.	King
07/18/2019	Father not present. Judge: King, Hon. Kenneth J.	King
07/18/2019	DCF report in accordance with G.L. c. 119, s. 21A filed. Judge: King, Hon. Kenneth J.	King
07/18/2019	Court issues order DCF to produce its file within 30 days.	King
07/18/2019	Temporary writ of summons to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
07/25/2019	Summons for father to issue. [FORM] Judge: King, Hon. Kenneth J.	King
07/25/2019	Mother present in Court. Judge: King, Hon. Kenneth J.	King
07/25/2019	Ordered mother appears at 3:10pm for 2pm hearing.	King
07/25/2019	Temporary writ of summons to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
07/25/2019	Father present in court. Mr. Guirand Judge: King, Hon. Kenneth J.	King
07/26/2019	Personal service of summons made on father. Mr. Guirand Judge: King, Hon. Kenneth J.	King
08/02/2019	Court investigation filed.	
08/08/2019	Ordered Mother may have a copy of the court investigation. Judge: King, Hon. Kenneth J.	King
08/11/2019	Notice dated 08/08/19 with exhibit a&b and attached affirmation of service filed.	
08/11/2019	Notice dated 08/08/19 re: liability, rights and property with affirmation of service filed.	
08/12/2019	Mother present in Court. Judge: King, Hon. Kenneth J.	King
08/12/2019	DCF report in accordance with G.L. c. 119, s. 21A filed. Judge: King, Hon. Kenneth J.	King
08/12/2019	Court issues order DCF case file-initial contact through July 2019-given to mother in hand. Mother ordered not to share or duplicate this file in any way.	King
08/12/2019	Temporary writ of summons to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
08/12/2019	Court issues order Any motions must be filed and served by 9/23/19.	King
08/12/2019	Notice re: harm, loss, or injury, Notice re: recitation, and affirmation of service filed.	
08/27/2019	Copy of Notice : Property and Affirmation of service filed.	

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08/27/2019	Request for Argument filed.  Judge: King, Hon. Kenneth J.	King
10/02/2019	Letter to Carla Marie Conforto filed.  Judge: King, Hon. Kenneth J.	Driscoll
10/04/2019	Notice of Pro Se and Affirmation of service filed.  Mother present in Court. Judge: King, Hon. Kenneth J.	King
10/04/2019	Motion filed Written order pursuant to Juvenile court rules.  Court issues order Temporary restraining order extended -see order.	King
10/04/2019	Father not present. Judge: King, Hon. Kenneth J.	King
10/04/2019	Temporary writitus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
10/04/2019	Motion allowed Written order pursuant to Juvenile Court rules.  Motion filed To Withdraw as Mother's Counsel by Atty Osgood with Affidavit.	King
10/24/2019	Temporary writitus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
10/24/2019	Mother present in Court. Judge: King, Hon. Kenneth J.	King
10/24/2019	DCF report in accordance with G.L. c. 119, s. 21A filed. Judge: King, Hon. Kenneth J.	King
10/24/2019	MOTHER referred to court clinic.  Father not present. Judge: King, Hon. Kenneth J.	King
10/24/2019	Motion allowed to withdraw as Mother's counsel by Atty Osgood.  Attorney removed/appearance vacated on behalf of mother. Judge: King, Hon. Kenneth J.	King
10/24/2019	Attorney to be appointed for Mother. Judge: King, Hon. Kenneth J.	King
10/24/2019	Memo/incident report from Francis Driscoll, Assistant Clerk Magistrate filed.  Written order filed by the court. Regarding Carla Marie Conforto's access to the clerk's office SCAN Judge: King, Hon. Kenneth J.	King
10/24/2019	Filed On this date Patricia M Osgood, Esq. dismissed/withdrawn as Appointed CP/CHINS/CRA/GU for Respondent 1 Carla Marie Conforto	King
11/14/2019	Filed On this date Margarida M Goncalves, Esq. added as Appointed CP/CHINS/CRA/GU for Respondent 1 Carla Marie Conforto Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Kenneth J King.	King



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11/14/2019	Filed On this date Margarida M Goncalves, Esq. dismissed/withdrawn as Appointed CP/CHINS/CRA/GU for Respondent 1 Carla Marie Conforto	
11/14/2019	Filed On this date Daniel J Mahoney, Esq. added as CAFL Staff Attorney for Respondent 1 Carla Marie Conforto	
11/14/2019	Filed On this date Daniel J Mahoney, Esq. dismissed/withdrawn as CAFL Staff Attorney for Respondent 1 Carla Marie Conforto	
11/14/2019	Filed On this date Leslie J Arsenault, Esq. added as Appointed CP/CHINS/CRA/GU for Respondent 1 Carla Marie Conforto Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Kenneth J. King	
11/15/2019	Letter addressed to Judge King from Carla Marie Conforto requesting continuance filed.	King
11/15/2019	DCF report in accordance with G.L. c. 119, s. 21A filed. Judge: King, Hon. Kenneth J	King
11/15/2019	Mother not present. Judge: King, Hon. Kenneth J	King
11/15/2019	Father not present. Judge: King, Hon. Kenneth J	King
11/15/2019	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
11/15/2019	Copy of email to Carla Marie Conforto from Judge King sent by email and to Harrison Ave mailing address filed.	
11/22/2019	Special notice (amended of disbelief and demand for return of abducted children dated 11/13/19 filed.	
11/28/2019	Attorney Leslie J Arsenault, Esq. enters an appearance for Carla Marie Conforto. Judge: King, Hon. Kenneth J	King
11/28/2019	Mother not present. Judge: King, Hon. Kenneth J	King
11/28/2019	Father not present. Judge: King, Hon. Kenneth J	King
11/28/2019	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
11/28/2019	Court issues order special notice of disbelief threatened as request for trial.	King
01/02/2020	Motion filed Dismiss with prejudice for lack of jurisdiction 12/30/19.	
01/08/2020	Mother present in Court. Judge: King, Hon. Kenneth J	King
01/08/2020	Father not present. Judge: King, Hon. Kenneth J	King

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01/08/2020	Motion denied to dismiss (mother's motion).	King
01/08/2020	Motion filed for publication by DCF (as to children #3 and 4-Keninde and Taewoe).	King
01/08/2020	DCF report in accordance with G.L. c. 119, s. 21A filed.  Judge: King, Hon. Kenneth J.	King
01/13/2020	Mother present in Court. Judge: King, Hon. Kenneth J.	King
01/13/2020	Special affidavit in the nature of clear notice of harm with opportunity to refer filed.	
01/13/2020	Motion allowed Publication.	King
01/13/2020	Special notice requiring a memorandum of decision based upon findings and conclusion of law for denial of injured party's special motion to dismiss filed.	
01/13/2020	Order for service by publication as to unknown/unnamed mother in newspaper. [FORM] Judge: King, Hon. Kenneth J.	King
01/13/2020	Father not present. Judge: King, Hon. Kenneth J.	King
01/13/2020	Temporary writ of habeas corpus filed. Judge: King, Hon. Kenneth J.	King
01/13/2020	Notice of assignment and release filed.	King
01/22/2020	Court Clinic report filed.	
01/23/2020	Mother present in Court. Judge: King, Hon. Kenneth J.	King
01/23/2020	Court issues order motions in limine due by 2/6/2020.	King
01/23/2020	Court issues order witness and exhibit list due by 1/31/2020.	King
01/23/2020	Father not present. Judge: King, Hon. Kenneth J.	King
01/23/2020	Motion allowed oral motion to amend motion for publication.	King
01/23/2020	Petition amended Keninde's true name to read: Eva Arlane Guirand and date of birth to read: 7/10/17.	King
01/23/2020	Petition amended Taewoe's true name to read: Steve Arlen Guirand date of birth 7/9/17.	King
01/23/2020	Court issues order publication order amended to add Eva Arlane Guirand and Steve Arlen Guirand publication return date now 3/19/2020.	King
01/23/2020	Paternity established see 19ps0023ca.	King
01/23/2020	Paternity established see 19ps0021ca.	King
01/23/2020	Temporary writ of habeas corpus filed. Judge: King, Hon. Kenneth J.	King
01/23/2020	notice of special appearance and estoppel, by mother filed.	

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01/23/2020	Order for service by publication as to unknown/unnamed mother in newspaper. [FORM] Judge: King, Hon. Kenneth J.	King
01/24/2020	Judge King's Scheduling Order filed.	King
01/31/2020	Proposed witness and exhibit list filed.	
02/05/2020	Motion filed Requesting rules of conduct for Carla Marie Conforto to ensure courtroom safety.	
02/05/2020	Court Clinic report filed.	
02/08/2020	Mother not present. Judge: King, Hon. Kenneth J.	King
02/08/2020	Father not present. Judge: King, Hon. Kenneth J.	King
02/08/2020	Court issues order court draws inference that Ms. Conforto is the biological mother of Carla and Steve.	King
02/08/2020	Court issues order all medical records may viewed by all counsel.	King
02/08/2020	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
02/13/2020	Medical records of Eva Ariane Guirand received from Boston Children's Hospital.	
02/13/2020	Medical records of Steve Arjen Guirand received from Boston Children's Hospital.	
02/14/2020	Medical records of Steve Arjen Guirand, Eva Ariane Guirand received from Boston Children's Hospital.	
02/24/2020	Permanency plan filed.	
03/09/2020	Mother present in Court Judge: King, Hon. Kenneth J.	King
03/09/2020	Colloquy with father conducted. Judge: King, Hon. Kenneth J.	King
03/09/2020	Father present in court. Judge: King, Hon. Kenneth J.	King
03/09/2020	Surrender signed by father - Andre Petion for both Olivier and Desiree filed.	King
03/09/2020	Court issues order Atty Fenichel struck.	King
03/09/2020	Father not present. Judge: King, Hon. Kenneth J.	King
03/09/2020	Motion filed with affidavit to withdraw by Atty Arsenault.	King
03/09/2020	Motion denied to withdraw by Atty Arsenault.	King
03/09/2020	Filed On this date Cindy A Fenichel, Esq. dismissed/withdrawn as Appointed CPACH/NSCRA/GU for Respondent 2 Andre G Petion	
03/09/2020	Adoption surrender by father filed. Judge: King, Hon. Kenneth J	King

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03/09/2020	Ordered Rachel Koehler takes stand and gives testimony.	King
03/09/2020	Ordered Mikki Freedman-Weiss takes stand and gives testimony.	King
03/09/2020	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
03/09/2020	Exhibit #1, #3 and #4, #8 through #33, #36 through #42 admitted.	King
03/09/2020	Consent or notice to Andre G Petion shall not be required upon any legal proceeding for adoption, guardianship, custody or other disposition of subject child sponsored by DCF or agency. [FORM]	King
03/09/2020	Found in Need of Care and Protection. Judge: King, Hon. Kenneth J	King
03/09/2020	Father found unfit as a result of being unwilling, incompetent, and/or unavailable. Judge: King, Hon. Kenneth J	King
03/10/2020	Notice of hearing and order regarding possession of recording devices in the court house sent to Carla Marie Conforto returned to court listing fictitious name and address - see notice attached to returned documents filed.	
03/12/2020	Mother present in Court. Judge: King, Hon. Kenneth J	King
03/12/2020	Motion filed mothers oral motion that the case be dismissed due to being trademarked.	King
03/12/2020	Motion denied mothers oral motion that the case be dismissed due to being trademarked.	King
03/12/2020	Father not present. Judge: King, Hon. Kenneth J	King
03/12/2020	Ordered Shannon Casey takes the stand and gives testimony.	King
03/12/2020	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
03/12/2020	Ordered Caroline Keefe takes the stand and gives testimony.	King
03/20/2020	Court orders rescheduling due to State of Emergency surrounding the Covid-19 virus.: Hearing on Merits (CR/CV) scheduled on: 03/23/2020 09:00 AM Has been: Rescheduled-Covid-19 emergency Hon. Kenneth J King, Presiding	King
03/20/2020	Court orders rescheduling due to State of Emergency surrounding the Covid-19 virus. Judge: King, Hon. Kenneth J	King
03/20/2020	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
03/20/2020	Court orders rescheduling due to State of Emergency surrounding the Covid-19 virus.: Hearing on Merits (CR/CV) scheduled on: 03/26/2020 09:00 AM Has been: Rescheduled-Covid-19 emergency Hon. Kenneth J King, Presiding	King

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03/20/2020	Court orders rescheduling due to State of Emergency surrounding the Covid-19 virus.: Hearing on Merits (CR/CV) scheduled on: 03/25/2020 09:00 AM Has been: Rescheduled-Covid-19 emergency Hon. Kenneth J King, Presiding	King
03/23/2020	Affidavit dated 03/23/20-request for precept filed.	Tan
03/23/2020	Precept issued for Desiree Penelope Petton. [FORM]	Tan
03/23/2020	FORM:  C&P Precept Sent On: 03/23/2020 16:17:41	
03/24/2020	Court orders rescheduling due to State of Emergency surrounding the Covid-19 virus.: Hearing on Merits (CR/CV) scheduled on: 03/24/2020 09:00 AM Has been: Rescheduled-Covid-19 emergency Hon. Kenneth J King, Presiding	King
03/24/2020	Temporary writs to DCF. [FORM] Judge: King, Hon. Kenneth J	King
03/30/2020	DCF Affidavit dated 3/30/2020 filed.	King
03/30/2020	Precept recalled. Judge: Tan, Hon. Gloria Y	Tan
04/07/2020	Court orders rescheduling due to State of Emergency surrounding the Covid-19 virus.: Other Hearing scheduled on: 05/28/2020 09:00 AM Has been: Rescheduled-Covid-19 emergency Hon. Gloria Y Tan, Presiding	Tan
04/07/2020	Temporary writs to DCF. [FORM] Judge: Tan, Hon. Gloria Y	Tan
05/01/2020	Written order filed by the court. SCAN ***Order Regarding Documentary Exhibits*** Judge: King, Hon. Kenneth J	King
05/22/2020	Court issues order Counsel request via email for case to be scheduled for a Lobby on 05/26/20.	King
05/22/2020	Court issues order Email and Letter sent by mail to Carla Marie Conforto.	King
05/22/2020	Letter to Carla Marie Conforto dated 05/22/20 and email to Carla Marie Conforto dated 05/22/20 filed.	King
05/26/2020	Filed On this date Leslie Marie Martin, Esq. added as DCF Attorney for Petitioner DCF - Arlington	
05/26/2020	Filed On this date Brooke M Chen, Esq. dismissed/withdrawn as DCF Attorney for Petitioner DCF - Arlington	
05/26/2020	Court issues order case heard through Zoom due to COVID19 with Judge King, Attya. Martin, Altamore, Roche, Wilnaki, Santoro, Arsenault, and mother calls in at 11:25am.	King

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05/28/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
06/05/2020	Amended witness and exhibit list filed.	
06/05/2020	Motion filed Release of prior hearing testimony to incorporate into ongoing trial.	
06/05/2020	Motion filed Child's for short order of notice.	
06/05/2020	Motion filed Child's for an expedited homestudy/placement hearing.	
06/05/2020	Motion filed Child's for temporary restraining order to prevent DCF from removing the child from current placement.	
06/11/2020	DCF report in accordance with G.L. c. 119, s. 21A filed.	
06/11/2020	Court issues order case heard through zoom call due to COVID19 with Judge King King, 2 interns, attys. martin, roche/arsenault/santoro/altamore/willmard, ms keefe (dcf), ms freedman-weiss (dcf).	
06/11/2020	Mother present in Court. Judge: King, Hon. Kenneth J.	King
06/11/2020	Father not present. Judge: King, Hon. Kenneth J.	King
06/11/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
06/11/2020	Motion allowed expedited homestudy.	King
06/11/2020	Court issues order no action taken on motion for restraining order to prevent DCF from removing child from current placement- but absent an emergency. DCF to give parties 10 days notice- see motion as endorsed.	King
07/07/2020	Probation homestudy filed.	
07/09/2020	Affidavit of Oliver Petion filed.	
07/09/2020	Request to Leslie Martin filed.	
07/09/2020	Motion filed Compel the commonwealth for the entire court record.	
07/09/2020	Motion filed Discharge counsel and for appointment of counsel.	
07/09/2020	Affidavit filed.	
07/09/2020	Motion filed Compel the commonwealth to facilitate petitioner access to her biological children via visitation.	
07/09/2020	Affidavit filed.	
07/13/2020	Motion filed Motion to Withdraw and Affidavit.	
07/13/2020	Stipulation of Facts of Desree Petion filed.	King
07/13/2020	Supplemental Witness and Exhibit List Since June 5, 2020 on behalf of the Minor child, Desree Petion filed.	King
07/14/2020	Court issues order Case heard via ZOOM due to COVID19 emergency.	King
07/14/2020	Mother present in Court. Judge: King, Hon. Kenneth J.	King
07/14/2020	Motion allowed Atty Arsenault's motion to withdraw.	King

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07/14/2020	Attorney removed/appearance vacated on behalf of mother. Judge: King, Hon. Kenneth J.	King
07/14/2020	Motion allowed to discharge counsel and for the appointment of counsel.	King
07/14/2020	Motion allowed in part Allowed as to discharge, denied as to appointment of new counsel.	King
07/14/2020	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
07/14/2020	Court issues order hearing stayed until 7/15/2020 @2pm.	King
07/14/2020	amended affidavit of Olivier Petion filed.	King
07/14/2020	Filed On this date Leslie J Arsenault, Esq. dismissed/withdrawn as Appointed CP/CHINS/CRA/CGU for Respondent 1 Carla Marie Conforto.	
07/15/2020	Court issues order Case heard via ZOOM due to COVID19 emergency.	King
07/15/2020	Father not present. Judge: King, Hon. Kenneth J.	King
07/15/2020	Mother present in Court. Judge: King, Hon. Kenneth J.	King
07/15/2020	Motion allowed Release of prior hearing testimony to incorporate into on goi trial.	King
07/15/2020	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
07/17/2020	Notice of docket entry of interlocutory appeal denying mother's motion for counsel filed.	
07/17/2020	Photograph of children filed.	
07/17/2020	Court issues order case heard via Zoom due to COVID19.	King
07/17/2020	Father not present. Judge: King, Hon. Kenneth J.	King
07/17/2020	Mother present in Court. Judge: King, Hon. Kenneth J.	King
07/17/2020	copy of U.S. District Court filing- petition for a writ of habeas corpus filed.	King
07/17/2020	Ordered testimony of Caroline Keefe taken, DCF.	King
07/17/2020	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
07/17/2020	order from Judge King re: mother's participation in the trial in this matter filed.	King
07/20/2020	Written stipulation, OF FACTS, filed by Desree Penelope Petion.	King
07/27/2020	Court issues order Case heard via Zoom due to COVID19.	King
07/27/2020	Mother not present. Judge: King, Hon. Kenneth J.	King
07/27/2020	Father not present. Judge: King, Hon. Kenneth J.	King



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07/27/2020	Court issues order testimony taken form DCF worker Caroline Keefe.	King
07/27/2020	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
07/28/2020	Amended witness and exhibit list filed.	
07/28/2020	Motion filed Appointment of counsel and continuance of fairness and Affidavit	
07/28/2020	Memorandum of law in support of motion filed.	
07/28/2020	Court issues order case heard via Zoom due to COVID19.	King
07/28/2020	Mother present in Court. (in courthouse) Judge: King, Hon. Kenneth J.	King
07/28/2020	Atts. Martin/Wilinski/Santoro/Roache/Altamore/SW Koehler/SW Friedman-Weiss present in court.	King
07/28/2020	Motion denied appointment of counsel and continuance- out of fairness.	King
07/28/2020	Father not present. Judge: King, Hon. Kenneth J.	King
07/28/2020	Court issues order testimony of Angela Gatto taken.	King
07/28/2020	Temporary writ of habeas corpus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
07/28/2020	Court issues order Atty. Martin notifies mother they plan on calling her as a witness during September trial.	King
08/07/2020	Written order filed by the court. SCAN (Regarding Appointment of Legal Advisor) Judge: King, Hon. Kenneth J.	King
08/07/2020	Filed On this date Thomas W Fothergill, Esq. added as Appointed CPCHINS/CRA/GU for Respondent 1 Carla Marie Conforto Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Kenneth J King.	
09/04/2020	Notice of Change of Placement filed.	

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

SUPREME JUDICIAL COURT  
FOR SUFFOLK COUNTY  
NO. SJ-2020-0578

Middlesex Juvenile Court  
Cambridge Division  
No. 19CP0037CA

IN RE: CARLA MARIE CONFORTO

JUDGMENT

This matter came before the Court, Budd, J., on a G. L. c. 211, § 3 petition, entitled In Re: Carla Marie Conforto. The petitioner seeks the superintendence power of this Court for appointment of counsel in her care and protection case, Middlesex Juvenile Court docket number 19CP0037CA. On August 7, 2020, the petitioner was appointed counsel, Thomas W. Fothergill.

Upon consideration thereof it is hereby ORDERED that the petition be, and the same hereby is, DENIED without hearing.

By the Court, (Budd, J.)

/s/Maura S. Doyle  
Maura S. Doyle, Clerk

Entered: September 8, 2020

**Stephen Cronin**

---

**From:** Stephen Cronin <stephen.cronin@jud.state.ma.us>  
**Sent:** Tuesday, September 8, 2020 11:59 AM  
**To:** 'Cambridge Juvenile'  
**Subject:** SJ-2020-0578, Carla Marie Conforto  
**Attachments:** 20200908113205406.pdf

**Clerk/Magistrate's Office,**

Attached please find a judgment entered today in the above referenced matter. Should you have any questions, please contact me. Thank you.

Steve

Stephen J. Cronin

Third Assistant Clerk

Office of Clerk Maura S. Doyle

Supreme Judicial Court for the County of Suffolk

John Adams Courthouse

One Pemberton Square, Suite 1-300

Boston, MA 02108

617-557-1185 (direct)

stephen.cronin@jud.state.ma.us

—Original Message—

**From:** it@sjc.state.ma.us [mailto:it@sjc.state.ma.us]  
**Sent:** Tuesday, September 8, 2020 11:32 AM  
**To:** stephen.cronin <stephen.cronin@jud.state.ma.us>  
**Subject:** Message from "RNP583879082DOC"

This E-mail was sent from "RNP583879082DOC" (MP 4055).

Scan Date: 09.08.2020 11:32:05 (-0400)

Queries to: it@sjc.state.ma.us



The Commonwealth of Massachusetts

SUPREME JUDICIAL COURT

FOR SUFFOLK COUNTY

JOHN ADAMS COURTHOUSE

ONE PEMBERTON SQUARE, SUITE 1300

BOSTON, MASSACHUSETTS 02108-1707

WWW.SJCCOUNTYCLERK.COM

MAURA S. DOYLE  
CLERK

September 8, 2020

CASE INFORMATION (617) 557-1100

FACSIMILE (617) 557-1117

ATTORNEY SERVICES (617) 557-1050

FACSIMILE (617) 557-1055

Carla Marie Conforto, Pro Se  
1127 Harrison Avenue  
Unit 6  
Roxbury, MA 02119-3665

RE: No. SJ-2020-0578

IN RE: IMPOUNDED CASE

NOTICE OF DOCKET ENTRY

You are hereby notified that on September 8, 2020, the following was entered on the docket of the above referenced case:

JUDGMENT: as on file. (Budd, J.)

Maura S. Doyle, Clerk

To: Carla Marie Conforto  
Middlesex Juvenile Court / Cambridge



SUPREME JUDICIAL COURT

Suffolk, ss

SJ-2020-0578  
September 8, 2020

In Re Carla Marie Conforto

NOTICE OF APPEAL TO FULL COURT

Now comes Petitioner Carla Marie Conforto who does hereby  
give notice I appeal Single Justice's denial of above captioned  
matter.

RECEIVED  
SEP 09 2020  
MAURA S. DOYLE CLERK  
OF THE SUPREME JUDICIAL COURT  
FOR SUFFOLK COUNTY

By: Carla Marie Conforto  
101127 Harrison Avenue  
Unit Six  
Boston, Massachusetts

CERTIFICATE OF SERVICE I certify I served all parties a copy of this Notice by email  
due to COVID-19 by Carla Marie Conforto 9th September 2020



The Commonwealth of Massachusetts  
SUPREME JUDICIAL COURT  
FOR SUFFOLK COUNTY  
JOHN ADAMS COURTHOUSE  
ONE PEMBERTON SQUARE, SUITE 1300  
BOSTON, MASSACHUSETTS 02108-1707  
WWW.SJCCOUNTYCLERK.COM

MAURA S. DOYLE  
CLERK

September 9, 2020

CASE INFORMATION (617) 557-1100  
FACSIMILE (617) 557-1117  
ATTORNEY SERVICES (617) 557-1050  
FACSIMILE (617) 557-1055

Carla Marie Conforto, Pro Se  
1127 Harrison Avenue  
Unit 6  
Roxbury, MA 02119-3665

RE: No. SJ-2020-0578

IN RE: IMPOUNDED CASE

NOTICE OF ASSEMBLY OF THE RECORD  
ON APPEAL OR ON RESERVATION AND REPORT TO THE FULL COURT

In accordance with the Rules of Appellate Procedure, Rule 9(e), notice this day has been sent to the Clerk of the Supreme Judicial Court for the Commonwealth, along with two (2) certified copies of the docket entries. The record has been fully assembled in the office of the Clerk of the Supreme Judicial Court for Suffolk County.

The appealing party must enter the case in the Supreme Judicial Court for the Commonwealth:

- a) if the appeal is subject to Mass. R. A. P. 10(a) and (b), within ten (10) days of receipt of this notice;  
OR
- b) if the appeal is subject to S.J.C. Rule 2:21 (copy attached) within fourteen (14) days of the filing of the notice of appeal.

This notice does not constitute entry in the Supreme Judicial Court for the Commonwealth.

A handwritten signature in black ink, appearing to read "Maura S. Doyle".  
\_\_\_\_\_  
Maura S. Doyle, Clerk

**RULE 2:21 APPEAL FROM SINGLE JUSTICE DENIAL OF RELIEF ON  
INTERLOCUTORY RULING**  
(Applicable to civil and criminal cases)

(1) When a single justice denies relief from a challenged interlocutory ruling in the trial court and does not report the denial of relief to the full court, the party denied relief may appeal the single justice's ruling to the full court. Unless the court otherwise orders, the notice of appeal shall be filed with the Clerk of the Supreme Judicial Court for Suffolk County within seven days of the entry of the judgment appealed from. Unless the single justice or the full court orders otherwise, neither the trial nor the interlocutory ruling in the trial court shall be stayed.

(2) The appeal shall be presented to the full court on the papers filed in the single justice session, including any memorandum of decision. Nine copies of the record appendix must be filed in the Office of the Clerk of the Supreme Judicial Court for the Commonwealth within fourteen days after the date on which the appeal is docketed in the full Supreme Judicial Court. The record appendix shall be accompanied by nine copies of a memorandum of not more than ten pages, double-spaced, in which the appellant must set forth the reasons why review of the trial court decision cannot adequately be obtained on appeal from any final adverse judgment in the trial court or by other available means. No response from the prevailing party shall be filed, unless requested by the court.

(3) This rule shall not apply to interlocutory appeals governed by Rule 15 of the Massachusetts Rules of Criminal Procedure.

(4) The full court will consider the appeal on the papers submitted pursuant to this rule, unless it otherwise orders.

\*\*\*\*\*

If an appeal from a judgment is subject to S.J.C Rule 2:21, set forth above, please note that:

1) within seven (7) days of the entry of the judgment,  
(unless the court otherwise orders), the appealing party must file a  
notice of appeal with the Clerk of the Supreme Judicial Court for  
Suffolk County; AND

2) within fourteen (14) days of the date of the filing of the  
notice of appeal, the appealing party must:

- docket the appeal in the office of the Clerk of  
the Supreme Judicial Court for the Commonwealth  
and pay any docket fee required by law; AND

3) within fourteen (14) days of the docketing of the appeal  
in the office of the Clerk of the Supreme Judicial Court for the  
Commonwealth, the appealing party must:

- file nine (9) copies of the memorandum and nine (9) copies of  
the record appendix with the Clerk of the Supreme Judicial Court  
for the Commonwealth.

SUPREME JUDICIAL COURT

Suffolk, ss

SJ-2020-0578  
September 8, 2020

In Re Carla Marie Conforto

NOTICE OF APPEAL TO FULL COURT

Now comes Petitioner Carla Marie Conforto who does hereby  
give notice I appeal Single Justice's denial of above captioned  
matter.

By: Carla Marie Conforto  
c/o 1127 Harrison Avenue  
Unit Six  
Boston, Massachusetts

CERTIFICATE OF SERVICE *I certify I served all parties a copy of this NOTICE by email due to COVID-19 to Carla Marie Conforto on September 8, 2020.*

Forecourt Paragon ®

## IMPOUNDED

09/09/2020  
11:38 amCommonwealth of Massachusetts  
SUPREME JUDICIAL COURT  
FOR SUFFOLK COUNTY  
Docket SheetSJ-2020-0578  
IN RE: IMPOUNDED CASE

## CASE HEADER

Entered	08/17/2020	Docket Type	SJC Single Justice
Case Status	Disp: appeal by Pet pendg	Status Date	09/08/2020
Case Nature	211.3 - Superintendence c 211 s 3	Sub-Nature	motapptc - Motion to Appoint Counsel
Justice	Budd, J.	Under Advancement	09/08/2020
Clerk	AS	Public	No - Impounded
Disposition	Decided: petition denied	Disposition Date	09/08/2020

## Other Court Information

Lower Court	Trial Court	Pet Role Lct	Defendant in lower court
Case Type	CV	TC Not App Dt	
Trial Court			
TC Number:			
TC Ruling Dt			

## INVOLVED PARTY

**Carla Marie Conforto**  
Petitioner  
1127 Harrison Avenue  
Unit 6  
Roxbury, MA 02119-3665  
Active 08/17/2020

Pro Se  
Active 08/17/2020 Entitled,

## ATTORNEY APPEARANCE

**Middlesex Juvenile Court / Camb**  
(Lower Court: civil or general)  
Office of the Clerk  
121 Third Street  
East Cambridge, MA 02141  
Phone: 617-494-4100  
Active 09/08/2020 Entitled, eMail Only (APC)

**Clerk - SJC for the Commonwealth**  
Clerk for Commonwealth  
1400 John Adams Courthouse  
One Pemberton Square, Suite 1400  
Boston, MA 02108  
Active 09/09/2020 Entitled,

'cdssj', '373724', '242408', 'y', 'y', 'y', 'y', 'y'

Page 1 of 2

Forecourt Paragon ®

## IMPOUNDED

09/09/2020  
11:38 amCommonwealth of Massachusetts  
SUPREME JUDICIAL COURT  
FOR SUFFOLK COUNTY  
Docket SheetSJ-2020-0578  
IN RE: IMPOUNDED CASE

DATE	P#	ENTRY
08/17/2020		Case entered.
08/17/2020	1	(IMPOUNDED) Affidavit of Indigency Request for Waiver, Substitution or State Payment Fees & Costs pursuant to G. L. c. 261, s. 27A-G filed by Carla Marie Conforto, pro se.
08/17/2020	2	Petition under c. 211, s. 3, filed by Carla Marie Conforto, pro se.
08/17/2020	3	Determination Regarding Fees & Costs by Clerk: ALLOWED FORTHWITH.
08/31/2020	4	Unsigned email from "returnmypropertynow@protonmail.com" to Assistant Amy Stewart dated August 31, 2020, filed. No attachments to email.
08/31/2020	5	Email from Carla Marie Conforto filed pro se and referencing "appendix 1 p, petition for extraordinary relief 2 p, and affidavit 3 p" with six JPEG files attached.
08/31/2020	6	Email from Carla Marie Conforto filed pro se and referencing "appendix 1 p, petition for extraordinary relief 2 p, and affidavit 3 p" with six JPEG files attached. (Docket note: email and attachments appear to be a duplicate of paper no. 5).
08/31/2020	7	Unsigned email from "returnmypropertynow@protonmail.com" to Assistant Clerk Amy Stewart filed and referencing "Attached: Pages 21 & 22 of 22, MASSACHUSETTS MIDDLESEX COUNTY JUVENILE COURT, Public Docket Report 19CP0037CA total:22 pages, pages 21& 22, EXHIBITS A, B, C, D" with nine JPEG files attached.
08/31/2020	8	Unsigned email from "returnmypropertynow@protonmail.com" to Assistant Clerk Amy Stewart filed and referencing "EXHIBIT E, ORDER RE MOTION TO WITHDRAW COUNSEL" with one JPEG file attached.
09/08/2020		Under advisement. (Budd, J.).
09/08/2020	9	Copy of Lower Court docket sheets, filed.
09/08/2020	10	JUDGMENT: "This matter came before the Court, Budd, J., on a G. L. c. 211, § 3 petition, entitled In Re: Carla Marie Conforto. The petitioner seeks the superintendence power of this Court for appointment of counsel in her care and protection case, Middlesex Juvenile Court docket number 19CP0037CA. On August 7, 2020, the petitioner was appointed counsel, Thomas W. Fothergill. Upon consideration thereof it is hereby ORDERED that the petition be, and the same hereby is, DENIED without hearing." (Budd, J.)
09/08/2020	11	EMAIL Notice to Counsel/Parties and Lower Court Re: P.# 10 filed.
09/08/2020	12	Notice to counsel/parties, regarding paper #11 filed.
09/09/2020	13	Notice of Appeal with Certificate of Service filed by Carla Marie Conforto, pro se.
09/09/2020	14	Notice of assembly of the record.
09/09/2020	15	Notice to counsel/parties, regarding paper #'s 13 & 14 filed.

A True Copy

9/9/20  
Attest:   
\_\_\_\_\_  
Date \_\_\_\_\_ Clerk \_\_\_\_\_



The Commonwealth of Massachusetts

SUPREME JUDICIAL COURT

FOR SUFFOLK COUNTY

JOHN ADAMS COURTHOUSE

ONE PEMBERTON SQUARE, SUITE 1300

BOSTON, MASSACHUSETTS 02108-1707

WWW.SJCCOUNTYCLERK.COM

September 9, 2020

CASE INFORMATION (617) 557-1100

FACSIMILE (617) 557-1117

ATTORNEY SERVICES (617) 557-1050

FACSIMILE (617) 557-1055

MAURA S. DOYLE

CLERK

Carla Marie Conforto, Pro Se  
1127 Harrison Avenue  
Unit 6  
Roxbury, MA 02119-3665

RE: No. SJ-2020-0578

IN RE: IMPOUNDED CASE

In accordance with the Rules of Appellate Procedure, Nos. 9(e) and 10(a) and (b), the enclosed copy of the Notice of Appeal and the Notice of Assembly of the Record on Appeal or on Reservation and Report to the Full Court in the above-entitled case are hereby mailed to you.

The appealing party must enter the case in the Supreme Judicial Court for the Commonwealth:

a) if the appeal is subject to S.J.C. Rule 2:21 (copy attached), within fourteen (14) days of the filing of the notice of appeal;

OR

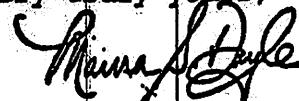
b) if the appeal is subject to Mass. R.A.P. 10(a) and (b), within ten (10) days of the receipt of this notice.

Entry of the case will be made in the Clerk's Office, Supreme Judicial Court for the Commonwealth, John Adams Courthouse, One Pemberton Square, Room 1400, Boston, Massachusetts 02108-1724, upon receipt of the filing fee of \$300.00, or upon written request if the appealing party has been permitted to proceed without payment of fees

in this court.

A copy of the record is available from this office for a fee of  
\$.20 per page.

Very truly yours,



Maura S. Doyle, Clerk

To: Carla Marie Conforto  
Middlesex Juvenile Court / Camb  
Clerk - SJC for the Commonwealth

PLA  
GROUNDS ONE AND TWO

GROUND ONE(a) Supporting facts

1. On or about the 10<sup>th</sup> July 2020, was informed by a student of law that an extreme conflict of interest existed between TA & KA (Mother) due to a violent relationship with a Conforto family member.

2. I filed a motion at a lower court level for the discharge of counsel and the appointment of new counsel see APPENDIX record #7

3. Lower court Judge King denied appointment of new counsel however acquiesced to the extreme conflict and discharged counsel.

4. Mother sought interlocutory review under chapter 231  
Mass App. Ct. see APPENDIX

5. Inadequate state corrective process under c.231 resulted in a denial of Interlocutory review as there is no right to one under state statute.

6. c. 211 §3 was filed by Mother <sup>Aug. 2020</sup> #6 complete with an argument under *Halbert v Michigan*

7. On or about August 31, 2020 a series of emails between Second Assistant Clerk Amy C. Stewart and an unknown clerk references a highly controversial class member Akkima Dannielle Briscoe #5

8. Akkima Dannielle Briscoe is a fundamental rights class member

AM

FILED  
IN CLERKS OFFICE

9. Recipient's use of the Express Classification  
in so far as U.S. stating "remember her as  
Akkima's friend," stated on 3rd September 2020 #5

10. Akkima has previously filed multiple lawsuits  
SJC pleadings asserting fundamental rights,  
including US District Court lawsuit involving  
dcf custody and 42 USC § 1983 violations.

11. Five days after the recipients use of the  
classification the record was altered to  
indicate, or mislead the Single Justice  
in believing Mother had court appointed counsel  
when in fact she did not.

12. On September 8, 2020 Single Justice denied relief  
without a hearing stating counsel was appointed  
#

13. On the same date EdiJo Cooper sent an  
email to Mother (Exhibit forthcoming) stating  
"You have been appointed an attorney"

14. Subsequently, Mother was misled into  
believing her newly appointed counsel would  
assist in preparing a case after the aforementioned  
denial of counsel as stated above in # 2

FILED  
IN CLERKS OFFICE

15 Shortly thereafter <sup>2020 OCT 16 PM 4:20</sup> appointed  
counsel informed U.S. Mother <sup>NOT CORRECT</sup> <sup>DISTRICT OF MASS.</sup> was a legal  
advisor.

16. Subsequently on or about September 15, 2020  
the lower court clerk in an appearance,  
suggested to Mother that the Supreme Judicial Court  
of Massachusetts made a mistake.

I had noticed upon exiting clerks office multiple  
clerks laughing having over heard the  
remark the SJC made the mistake.

17. Such trickery in process in the obliterating or  
the alteration upon facts of the interlocutory  
review is so unfair as to violate  
the Due process clause in its own force

GROUND Two  
Supporting facts (a)

FILED  
IN CLERKS OFFICE

2020 OCT 16 PM 4:21

1. Judicial clerks ~~of the lower court or the  
SJC~~ are the Judicial branch of government.
2. The Judicial interference with TA & KA Mothers fundamental right to access the courts, assisted the Executive prosecutor / DCF.
3. As such the two powers of government joined hands interfering with Mothers fundamental rights to fair process, farroha rights, and rights under Halbert v Michigan thus violating separation of powers doctrine.